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*VIA ECF*

July 10, 2023

Hon. Magistrate Judge Andrew E. Krause  
Southern District of New York  
Charles L. Bricant United States Courthouse  
300 Quarropas Street  
White Plains, New York 10601

**Re: Jones v. City of Mount Vernon, et al.**  
**Docket No: 22-cv-00414 (NSR)(AEK)**

Dear Magistrate Judge Krause:

As the Court is aware, the undersigned and The Quinn Law Firm, PLLC represent all named Defendants in the above-referenced matter.

Pursuant to the Order of Reference in this case (D.E. 29), the parties jointly write to respectfully request that the Court grant a two-week extension of time from July 13, 2023 until July 27, 2023 for the parties to serve responses to the initial requests for documents and interrogatories.

The parties also jointly write to respectfully request that the Court adjourn the telephonic status conference currently scheduled for Friday, July 14, 2023, at 10:30 a.m. The parties respectfully propose the following alternative dates for the telephonic status conference: July 21, 2023; July 28, 2023; August 4, 2023.

The reasons for these requests are that Defendants are still conferring with their clients and gathering materials responsive to Plaintiff's demands, and Plaintiff's counsel will be on vacation from July 13<sup>th</sup> to July 19<sup>th</sup>. This is the first request for an extension of time to respond to the initial demands and for an adjournment of the telephonic status conference. The parties do not believe these extensions will affect any other scheduled dates.

The parties thank the Court for its time and consideration of these requests.

Respectfully submitted,

/s/ Steven Bushnell

/s/ Robert Rickner

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